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ATTORNEYS FOR APPELLANT KYLE LAWRENCE

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**Kyle Lawrence**

*Appellant*

**v.**

**Frost Bank**

*Appellee*

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**Appeal No. 3:19-cv-01843-X**

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**APPELLANT’S SECOND MOTION FOR  
EXTENSION OF DEADLINE TO FILE BRIEF**

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Appellant Kyle Lawrence (“**Appellant**” or “**Lawrence**”) files this *Appellant’s Second Motion for Extension of Deadline to File Brief* (the “**Motion**”), respectfully seeking an extension to file Appellant’s Brief in this matter. In support of the Motion, Appellant states as follows:

1. On November 6, 2019, Appellant filed *Appellant’s Second Motion for Leave to Supplement Record* (the “**2<sup>nd</sup> Motion to Supplement**”) seeking to supplement the appellate record with: (1) Appellee’s trial exhibits; (2) Appellant’s Exhibit EE; (3) The pre-trial order; and (4) Appellee’s disclosures.
2. The Court has not yet ruled on Appellant’s 2<sup>nd</sup> Motion to Supplement.

3. The current deadline for Appellant to file his brief is as early as Wednesday, December 4, 2019.<sup>1</sup>

4. In the interest of caution, Appellant seeks to ensure that he has sufficient time to finalize his brief with appropriate citations to the supplemented record once this Court rules on his 2<sup>nd</sup> Motion to Supplement.

5. Therefore, Appellant respectfully requests that this Court extend the deadline to file Appellant's Brief to the later of seven (7) days following the date that the Bankruptcy Court supplements the record pursuant to the 2<sup>nd</sup> Motion to Supplement or December 23, 2019.

WHEREFORE, for the reasons cited herein, Appellant respectfully requests that this Court extend his deadline to file Appellant's Brief until the later of December 23, 2019, or seven (7) days following the date that the Bankruptcy Court supplements the record pursuant to the 2<sup>nd</sup> Motion to Supplement.

**DATED this 25<sup>th</sup> day of November, 2019.**

Respectfully submitted,

**THE MITCHELL LAW FIRM, L.P.**

**/s/ Gregory W. Mitchell**

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<sup>1</sup> This Court granted Appellant's first Motion for Extension on October 22, 2019 (Dkt. #6), pursuant to which Appellant had requested that the deadline be extended to the later of December 2, 2019, or 30 days following the date that the Bankruptcy supplemented the record. The Bankruptcy Court initially supplemented the record on November 4, 2019 (Dkt. #9) – which would make Appellant's current deadline December 4, 2019. However, the Bankruptcy Court subsequently augmented its supplement on November 22, 2019 (Dkt. #12) – which arguably extends Appellant's current deadline to December 23, 2019.

ATTORNEY FOR APPELLANT, KYLE  
LAWRENCE

**CERTIFICATE OF CONFERENCE**

I hereby certify that on November 25, 2019, I communicated with Mr. M. Chad Berry regarding this Motion and the relief requested. Mr. Berry indicated that Appellee was unopposed to the relief requested.

**/s/ Gregory W. Mitchell**  
Gregory W. Mitchell  
Attorney for Appellant

**CERTIFICATE OF SERVICE**

I hereby certify that on this **25<sup>th</sup> day of November, 2019**, the foregoing was served on all counsel of record in this matter via the Court's ECF system.

**/s/ Gregory W. Mitchell**  
Gregory W. Mitchell  
Attorney for Appellant